

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
	)	
Advanced Television Systems	)	MB Docket No. 87-268
and Their Impact upon the	)	
Existing Television Broadcast	)	
Service	)	
	)	

To: The Commission

**PETITION FOR RECONSIDERATION  
OF ALLBRITTON COMMUNICATIONS COMPANY AND GANNETT CO., INC.**

Allbritton Communications Company ("Allbritton") and Gannett Co., Inc. ("Gannett") hereby submit this Joint Petition for Reconsideration of the Seventh Report & Order in the above-referenced proceeding.<sup>1</sup> Specifically, Allbritton and Gannett seek to amend the respective FCC Form 381, post-transition service area certifications of WJLA-DT, Washington DC (Allbritton) and WUSA-DT, Washington, DC (Gannett) to specify their replicated analog, high-band, VHF service areas rather than their maximized UHF DTV service areas.

Allbritton indirectly owns WJLA-DT in Washington, DC ("Washington") and Gannett indirectly owns WUSA-DT in Washington. Both stations are operating maximized, UHF DTV facilities (channel 39 for WJLA, channel 34 for WUSA) during the transition and both elected to return to their respective high-band, VHF channels (channel 7 for WJLA, channel 9 for WUSA)

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<sup>1</sup> See *Advanced Television Systems and their Impact Upon the Existing Broadcast Service, Seventh Report & Order and Eighth Further Notice of Proposed Rulemaking*, MB Docket No. 87-268, FCC 07-138, released August 6, 2007.

for their post-transition operations. The stations share a combined analog channel 7/channel 9 antenna on a tower located in Northwest Washington.<sup>2</sup>

Allbritton and Gannett recently learned that they could use their combined channel 7/channel 9 analog antenna for their post-transition DTV operations. Given the rapidly approaching analog cut-off date of February 17, 2009, the companies decided to use the combined analog antenna for the respective post-transition DTV operations of WJLA and WUSA. By using the existing analog antenna, the stations will avoid the substantial analog service disruptions and coverage losses that would inevitably occur if the combined analog antenna were removed from the tower and replaced prior to February 17, 2009. In addition, the stations will also avoid any post-transition DTV start-up delays on their new digital channels resulting from the shortage in antenna manufacturer capacity and qualified tower riggers. Both of these results - providing more analog service through February 17, 2009 and avoiding DTV start-up delays after February 17, 2009 – are clearly in the public interest.

Unfortunately, this logical, common sense plan to transition to the DTV only world after February 17, 2009, faces creates a serious obstacle. Like a number of other stations returning to their high-band VHF analog channels for post-transition digital operations, the theoretical facilities authorized in the DTV Table and Appendix B for WJLA and WUSA cannot be built.<sup>3</sup> Both stations have wildly-scalloped, directional antenna patterns and service areas that do not

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<sup>2</sup> WUSA and WJLA also share a DTV antenna on the same tower with two Washington area stations, WETA-DT and WHUT-DT.

<sup>3</sup> The Commission, in fact, recognized this phenomenon in the *Third Periodic DTV NPRM* when it noted that stations “may be unable to build precisely the facilities specified in the new DTV Table Appendix B (for example, if an antenna producing the exact antenna pattern described in Appendix B is not available).” *Third Periodic Review of the Commission’s Rules & Policies Affecting the Conversion to Digital Television, Notice of Proposed Rulemaking*, MB Docket No. 07-91, FCC 07-70, ¶ 93, released May 18, 2007.

match their existing analog patterns or service areas. The attached exhibit compares the 7<sup>th</sup> R&O and Table B allotment patterns for each station with the antenna pattern of the existing combined analog antennas.

Without a change in these unbuildable DTV allotments or a significant revision in the Commission's proposals for processing post-transition DTV construction permit applications proposing service area increases, both WJLA and WUSA will be forced to reduce their post-transition DTV power levels significantly to keep their actual DTV contours entirely within their theoretical allotment contours. This forced power reduction will have severely negative consequences on February 18, 2009 and thereafter. When the analog shut-down occurs, the required post-transition DTV power level reduction for WJLA alone will cause an estimated loss of service to over 220,000 viewers currently receiving analog service -- a result that is clearly not in the public interest.

To prevent coverage losses at the most crucial time of the transition, Allbritton and Gannett urge the FCC to grant the instant Petition and change the certified, post-transition service areas of WJLA and WUSA to their replicated analog service areas – a change that is likely to produce an Appendix B antenna pattern much closer to the antenna pattern of the existing, combined analog antenna. The change in antenna patterns will also produce a better match between the analog service areas of WJLA and WUSA and the post-transition DTV service areas of these stations, thus increasing the likelihood of a successful transition by reducing the potential for stranded analog viewers after February 17, 2009.

Respectfully submitted,

ALLBRITTON COMMUNICATIONS  
COMPANY

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GANNETT CO., INC.

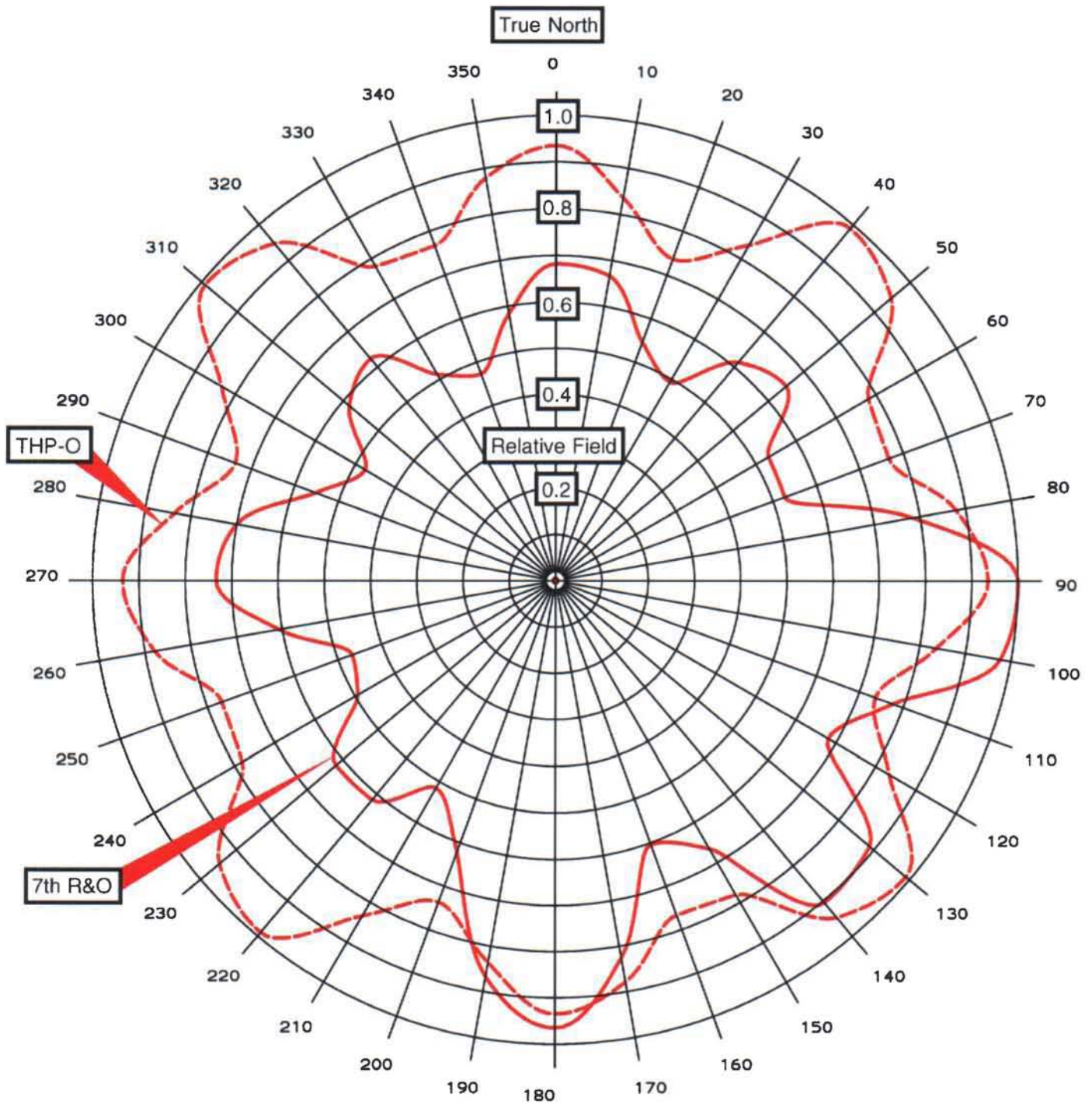
/s/ David P. Fleming /s/

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Dated: October 10, 2007

**EXHIBIT 1**

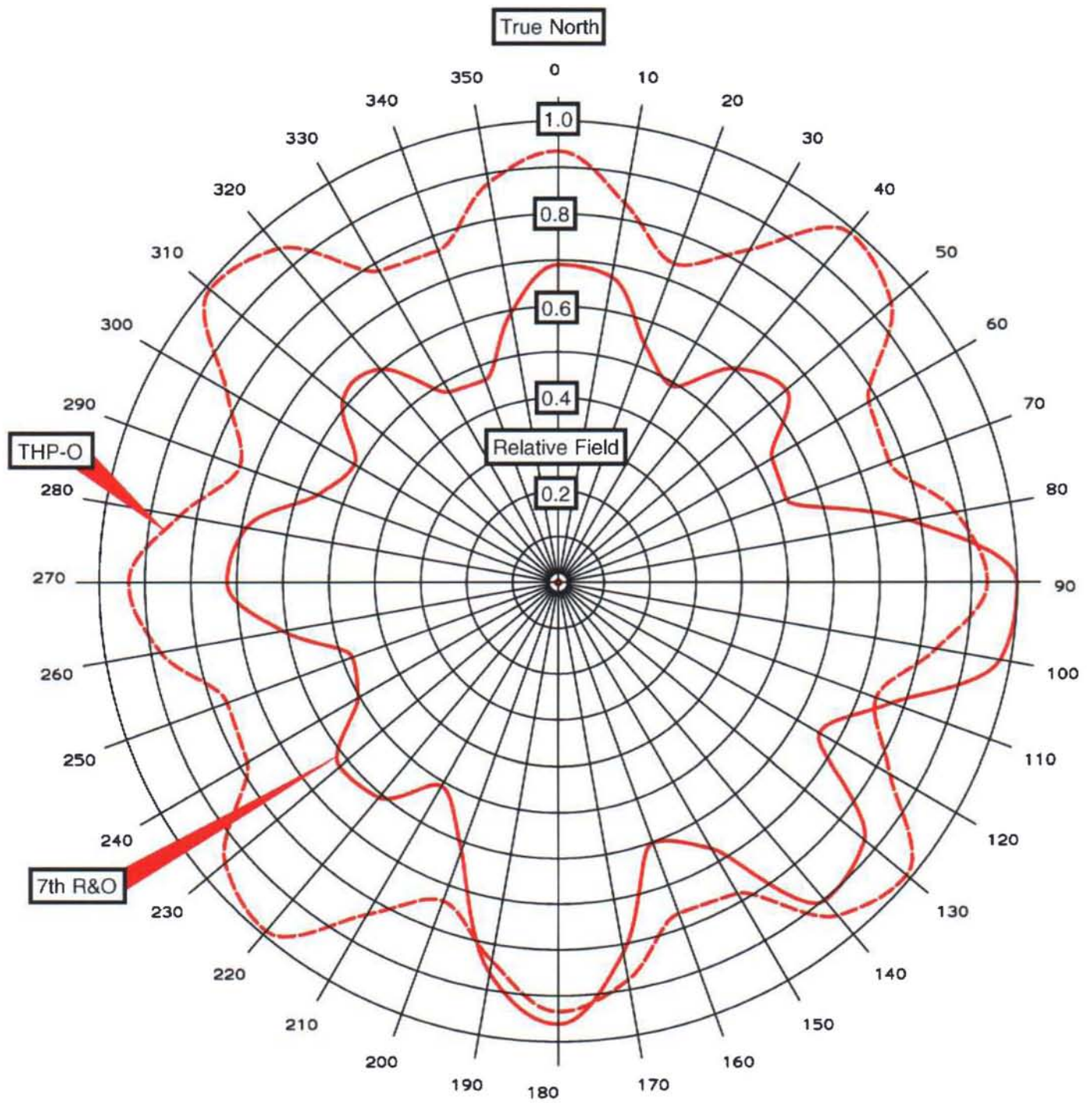




### WUSA ANTENNA PATTERN COMPARISON

prepared September 2007 for  
**Detroit Free Press, Inc.**  
WUSA-DT Washington, DC

Cavell, Mertz & Associates, Inc.  
Manassas, Virginia



### WJLA ANTENNA PATTERN COMPARISON

prepared September 2007 for  
**ACC Licensee, Inc**  
WJLA-DT Washington, DC

Cavell, Mertz & Associates, Inc.  
Manassas, Virginia